

Remedial Investigation Field Program Technical Memorandum

Remedial Investigation/Feasibility Study West County Road 112 Ground Water Plume Site Midland, Midland County, Texas

Remedial Action Contract 2 Full Service Contract: EP-W-06-004 Task Order: 0065-RICO-A6R6

Prepared for

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LIST OF ACRONYMS AND ABBREVIATIONS

EA Engineering, Science, and Technology, Inc.

EPA U.S. Environmental Protection Agency

GPS Global Positioning System
IDW investigation-derived waste
MCL Maximum Contaminant Level

QC quality control

RI Remedial Investigation SAP Sampling and Analysis Plan

TAL Target Analyte List

TCEQ Texas Commission on Environmental Quality

TCL Target Compound List

TOC top-of-casing

USGS U.S. Geological Survey VOC volatile organic compound

WCR West County Road

1. INTRODUCTION

This technical memorandum details the next phase of the Remedial Investigation (RI) field program for the West County Road (WCR) 112 Ground Water Plume Site (site) located in Midland, Midland County, Texas. This document will continue to be updated for each investigative phase of the RI by the U.S. Environmental Protection Agency (EPA) and EA Engineering, Science, and Technology, Inc. (EA) using data obtained from each prior phase of the RI. This document provides details specific to this phase of the RI field program, such as sample types, estimated sample quantities, sample locations, sample collection methods, field procedures for borehole drilling and well installation, and the RI field schedule. The Quality Assurance Project Plan and Field Sampling Plan are incorporated into the main body of the EPA-approved Sampling and Analysis Plan (SAP), dated 27 October 2010 (EA 2010b).

1.1 REMEDIAL INVESTIGATION PHASES COMPLETED TO DATE

• Phase 1 Hydrogeological Assessment – November 2011

The Phase 1 Hydrogeological Assessment includes geophysical logging of existing private water wells and possible deployment of water-level data-logging probes in existing private water wells. During November 2010, EPA coordinated with the U.S. Geological Survey (USGS) to perform gamma and resistivity geophysical logging of 17 existing monitoring wells in the vicinity of the site. The USGS logged Schlumberger Technology Corporation monitoring wells MW-09, MW-22/22A/22B, MW-23/23A/23B, MW-26/26A/26B, MW-27/27A/27B, MW-28/28A/28B, and MW-29 (see Figure 2 for well locations). The deployment of water-level data logging probes was deferred until a later phase of the RI field program.

• Phase 1 Environmental Sampling – November and December 2010

From 29 November through 3 December 2010, EA collected tap water samples from 106 private water supply wells for analysis for total metals and hexavalent chromium. Private water supply wells along the chromium plume perimeter (chromium below the EPA National Primary Drinking Water Regulation Maximum Contaminant Level [MCL; EPA 2011a]) were sampled for total chromium analysis to evaluate the need for filtration systems. In addition, EA collected tap water samples from a subset of private water supply wells located within the plume and along the plume perimeter for hexavalent chromium analysis in order to develop a correlation between total and hexavalent chromium.

• Phase 2 Environmental Sampling – April, May, and June 2011

From 11–14 April 2011, EA collected pre-filtration tap water samples from 106 private water supply wells for analysis for total metals and hexavalent chromium. Private water supply wells along the chromium plume perimeter (chromium below the MCL [EPA 2011a]) were sampled for total chromium analysis to evaluate the need for filtration systems. In addition, EA collected tap water samples from a subset of private water

supply wells located within the plume and along the plume perimeter for hexavalent chromium analysis in order to develop a correlation between total and hexavalent chromium.

From 16–20 May 2011, in conjunction with Texas Commission on Environmental Quality (TCEQ)'s post-filtration tap water sampling event, EA collected (1) pre-filtration tap water samples from 43 private water supply wells with TCEQ filtration systems in place; and (2) tap water samples from four newly-identified perimeter private water supply wells without filtration systems in place. Tap water samples were submitted for analysis for total metals and hexavalent chromium.

From 20–23 June 2011, EA collected ground water samples from 42 newly-installed monitoring wells (see Phase 2 Hydrogeological Assessment below) and 16 existing monitoring wells using trailer-based low-flow (micro-purge) sampling methodology for total metals analysis.

• Phase 2 Hydrogeological Assessment – May and June 2011

From 9 May through 3 June 2011, EA and Peterson Drilling & Testing Services, Inc. drilled, geophysical logged, and installed 21 dual-completion (nested) ground water monitoring wells (total of 42 monitoring points) (Figure 2).

1.2 DATA GAPS

Further field investigation will be conducted in an attempt to eliminate data gaps. Data gaps include:

- The extent of chromium impacted ground water is not fully defined to the northeast of I-20.
- The extent of volatile organic compound (VOC)-impacted ground water is not defined at the WCR 112 site.
- The nature and extent of impacted soil is not defined with regards to any of the chemicals of potential concern.

1.3 ELEMENTS OF THIS PERIOD OF THE RI FIELD PROGRAM

The next phase of the RI field program for the WCR 112 site will include the following elements:

• Hydrogeological Assessment Phase 3

New monitoring well installation, geophysical logging of open boreholes, and well development

• Environmental Sampling Phase 3

Tap water sampling of private water wells and ground water sampling of new and existing monitoring wells

1.4 DOCUMENT ORGANIZATION

Following this introduction, Section 2 describes the tasks to be accomplished during the upcoming phase of the RI field program. Section 3 presents the updated RI field schedule.

2. FIELD PROGRAM SAMPLING ACTIVITIES

Except as outlined below, all aspects of sample collection, the analytical program, sample handling, as well as handling quality control (QC) requirements, and data assessment are outlined in the EPA-approved SAP (EA 2010b). Field activities will be performed in accordance with the SAP and the Health and Safety Plan, dated 8 October 2010 (EA 2010a), as well as the *Contract Laboratory Program Guidance for Field Samplers* (EPA 2011b). Figure 2 presents the sample locations and proposed monitoring well locations for the next phase of RI field activities. Quality assurance and QC samples will be collected in accordance with protocols established in the SAP. Investigation-derived waste (IDW) will be characterized and disposed of in the manner outlined in the SAP.

The following SAP tables, which follow the body of this memorandum, were updated to reflect analysis for Target Compound List (TCL) VOCs in ground water, as well as IDW characterization:

- Table 3, Quality Assurance Indicator Criteria, presents the acceptance criteria for definitive onsite and offsite laboratory data for chemical analyses of investigation samples only.
- Table 5, Required Volume, Containers, Preservatives, and Holding Times, specifies the
 required sample volume, container type, preservation technique, and holding time for
 each analysis that is to be conducted during each phase of sampling. Analyses for the
 IDW profiling will be conducted according to the specifications in the selected analytical
 methods listed in Table 5.
- Table 6, Frequency of Field Quality Control Samples, presents the frequency of QC samples to be collected at the site.

2.1 NEW MONITORING WELL INSTALLATION

EA will install new monitoring wells at up to six locations to provide additional information regarding the horizontal and vertical distribution of chromium in ground water at the WCR 112 site. Monitoring wells will be constructed using multiple (nested) completions at each location, with screened intervals based on interpretation of geophysical logs collected from open boreholes. EA will be responsible for obtaining right-of-way access from the Texas Department

of Transportation and coordinating subsurface utility location with the Texas Excavation Safety System.

Monitoring wells WMW-27, WMW-29, WMW-31, WMW-32, WMW-33, and WMW-34 will be drilled in the approximate locations indicated on Figure 2. Locations may be revised in the field upon consultation with, and approval from, EPA. EA proposes to install up to six nested ground water monitoring wells (total of 12 monitoring points) addressing Ogallala and Edwards-Trinity water-bearing zones north of U.S. Interstate Highway 20.

EA will survey the locations and top-of-casing (TOC) elevations for all newly-installed monitoring wells using portable Global Positioning System (GPS) equipment. Elevations for each well TOC will be measured and referenced to a relative benchmark. As an alternative, EA may subcontract a local State of Texas-Registered Professional Licensed Surveyor to perform survey activities.

2.2 GEOPHYSICAL LOGGING

Geophysical logging will be conducted on open boreholes prior to the completion of newly-installed monitoring wells to obtain a better understanding of geologic conditions. In addition, existing monitoring and public water supply wells will be geophysically logged, pending owner access and EPA technical direction. Open boreholes and existing wells will be logged using gamma and resistivity logging instruments. Depending on availability, EPA will coordinate with the USGS to perform geophysical logging activities. As a contingency measure, EA has subcontracted a geophysical logging firm to support the investigation in the case where the USGS is unavailable.

EA will survey the locations and TOC elevations for those existing wells undergoing geophysical logging using portable GPS equipment. Elevations for each well TOC will be measured and referenced to a relative benchmark. As an alternative, EA may subcontract a local State of Texas-Registered Professional Licensed Surveyor to perform survey activities.

2.3 TAP WATER SAMPLING

EA will collect tap water samples from up to 120 existing private water supply wells for analysis. EA will coordinate with EPA prior to each mobilization to identify which wells are to be sampled and to ensure that the necessary access agreements are in place. Samples will be analyzed for Target Analyte List (TAL) metals, a subset of which may also be analyzed for hexavalent chromium.

In the case of an existing water supply well with an existing non-functioning pump in place, EA may collect a ground water sample using snap samplers or low-flow sampling methodology (submersible pump). A well pump service will be subcontracted to pull and reset the existing non-functioning or missing pump.

2.4 MONITORING WELL GROUND WATER SAMPLING

Following well development, ground water samples will be collected from existing and newly-installed monitoring wells using snap samplers or low-flow sampling methodology. The number

of snap samplers deployed along screened intervals will be determined following geophysical logging of the existing and new wells. The snap samplers will remain in the wells long enough for the well water, contaminant distribution, and flow dynamics to re-stabilize following sampler deployment. Ground water samples will be analyzed for TAL metals, a subset of which may also be analyzed for hexavalent chromium and TCL VOCs. EA will coordinate with EPA prior to each mobilization to identify which wells are to be sampled and to ensure that the necessary access agreements are in place.

2.5 SAMPLE DESIGNATION

Sampling designations associated with monitoring wells have been revised. Each sampling location will be designated with a unique alphanumeric designation according to the following sample classifications:

- **New Monitoring Well Designation**—Newly-constructed monitoring well designation will include two fields that are separated by a dash; for example: WMW-27A.
 - The first alpha character in the first field, "W," identifies the EPA site (WCR 112); this will avoid any confusion with existing non-EPA monitoring wells.
 - The second and third alpha characters in the first field, "MW," identify the well as a permanent monitoring well.
 - The first two characters of the second field, "27," represent the monitoring well number designation or identifier.
 - The third character of the second field, "A," represents the water-bearing zone in which the well is screened, where:
 - \circ A = shallow water-bearing zone (Ogallala)
 - o B = deep water-bearing zone (Edwards-Trinity/Antler Sand)
 - A fourth numeric character may be added to the second field, "1" or "2," to differentiate between the upper and lower segments of each water-bearing zone, where:
 - o A1 = upper shallow water-bearing zone (screened in upper Ogallala)
 - o A2 = lower shallow water-bearing zone (screened in lower Ogallala)
 - o B1 = upper deep water-bearing zone (screened in upper Edwards-Trinity/Antler Sand)
 - o B2 = lower deep water-bearing zone (screened in lower Edwards-Trinity/Antler Sand).
- Existing Monitoring Well Designation—Existing monitoring well designation will include two fields that are separated by a dash; for example: SMW-22.
 - The first alpha character in the first field, "S," identifies the owner of the existing monitoring well, where:
 - o S = Schlumberger Technology Corporation
 - \circ L = Lear Corporation
 - The second and third alpha characters in the first field, "MW," identify the well as a permanent monitoring well.
 - The first two characters of the second field, "22," represent the monitoring well number designation or identifier.

• Monitoring Well Ground Water Sample Designation—Ground water sample designation for monitoring wells will also utilize will include two fields that are separated by a dash; for example: WMW-27A or SMW-22.

3. PROPOSED FIELD SCHEDULE

The following schedule will be followed for the upcoming phase of the RI sampling program. Field changes to schedule may be required due to adverse weather conditions or site access issues. EPA will be notified of conditions which may impact the field work schedule.

RI Task (Phase 3)

Utility location/property access Install and develop new monitoring wells Geophysically log new monitoring wells Tap water sampling Monitoring well sampling

Schedule

October 2011
Late October to early November 2011
Late October to early November 2011
December 2011
December 2011.

REFERENCES

- EA Engineering, Science, and Technology, Inc. (EA). 2010a. Health and Safety Plan, West County Road 112 Ground Water Plume Superfund Site, Midland, Midland County, Texas. 8 October.
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- U.S. Environmental Protection Agency (EPA). 2007. *Multi-Media, Multi-Concentration, Organic Analytical Service for Superfund (SOM01.2)*. EPA/540-FS-07-001. Office of Solid Waste and Emergency Response. August.
- EPA. 2010. USEPA Contract Laboratory Program Statement of Work for Inorganic Superfund Methods ISM01.2. January.
- EPA. 2011a. Drinking Water Contaminants, National Primary Drinking Water Regulations. Updated 11 January.
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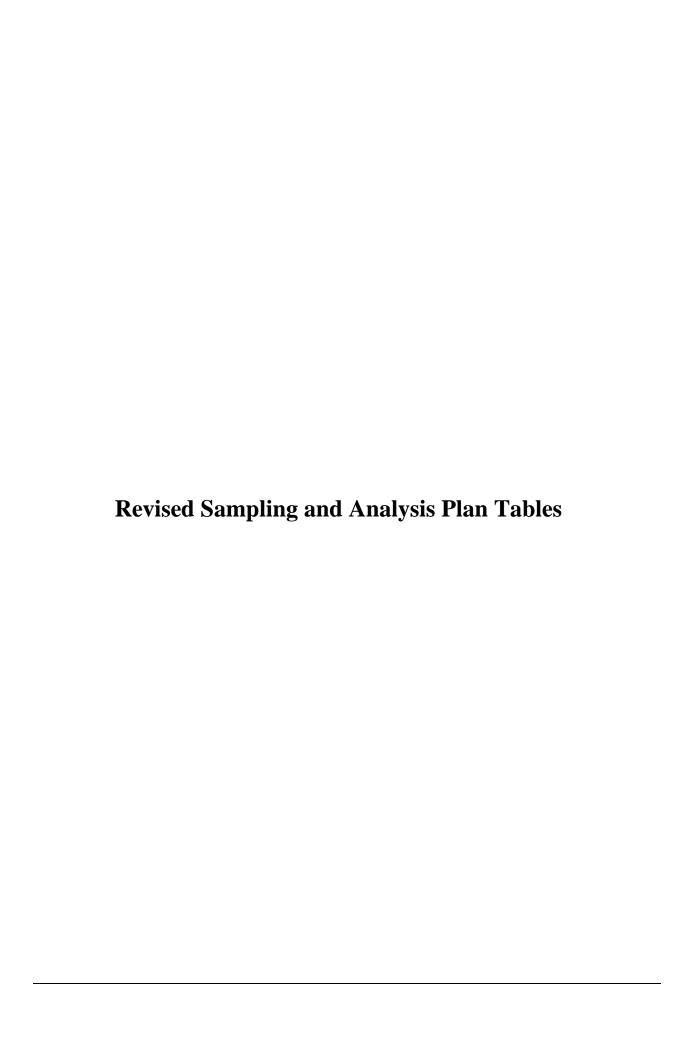


TABLE 3

QUALITY ASSURANCE INDICATOR CRITERIA WEST COUNTY ROAD 112 GROUND WATER PLUME SITE

Indicator			Acceptance Criteria for	
Parameter	Analytical Parameter	QC Sample	Laboratory Analysis	
Accuracy	TCL VOCs	MS, MSD	50 to 150 percent recovery	
(percent recovery)		Blanks	Less than CRQL	
	TAL Metals	MS	75 to 125 percent recovery	
	Hexavalent chromium	LCS	80 to 120 percent recovery	
		Blanks ¹	Less than CRDL	
Precision (RPD)	TCL VOCs	MS, MSD	30 percent RPD	
		Field duplicates	50 percent RPD	
	TAL Metals	MS, MD	20 percent RPD (aqueous)	
	Hexavalent chromium		35 percent RPD (solid)	
		Field duplicates	50 percent RPD	
Sensitivity	Analytical tests	MS, MD, MSD	Not applicable	
(quantitation limits)		Field duplicates		
Completeness	The objective for data completeness is 90 percent.			
Representativeness The sampling network analytical methods for this site are designated and the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for this site are designated as the sampling network analytical methods for the sampling network and the sampling network analytical methods for the sampling network		re designed to provide data that		
	are representative of site conditions.			
Comparability	The use of standard published sampling and analytical methods, and the use of QC samples, will ensure data of known quality. These data can be compared to other data of known quality.			

Notes:

CRDL = Contract-required Detection Limit

CRQL = Contract-required Quantitation Limit

LCS = laboratory control sample

MD = matrix duplicate

MS = matrix spike

MSD = matrix spike duplicate

QC = quality control

RPD = relative percent difference

TAL = Target Analyte List

TCL = Target Compound List

VOC = volatile organic compound

¹ May include method blanks, reagent blanks, instrument blanks, calibration blanks, and other blanks collected in the field (such as field blanks)

TABLE 5

REQUIRED VOLUME, CONTAINERS, PRESERVATIVES, AND HOLDING TIMES WEST COUNTY ROAD 112 GROUND WATER PLUME SITE

Parameter	Method	Volume and Container	Preservatives	Holding Time ¹		
Ground Water Samples						
TAL metals	CLP ISM01.2 ²	One 1-liter narrow-mouth HDPE bottle	Nitric acid to pH < 2 Store at 4±2°C	180 days to analysis		
Hexavalent chromium	EPA SW-846 7199 ³ or equivalent	One 125-milliliter narrow-mouth HDPE bottle	Store at 4±2°C	24 hours to analysis		
TCL VOCs	CLP SOM01.2 ⁴	Three 40- milliliter glass vials with Teflon TM -lined cap	HCl to pH < 2; Store at 4±2°C	14 days		
Soil Samples						
TAL metals	CLP ISM01.2 ²	One 8-ounce glass jar with Teflon TM -lined cap	Store at 4±2°C	180 days to analysis		
Hexavalent chromium	EPA SW-846 7196 ³ or equivalent	One 8-ounce glass jar with Teflon TM -lined cap	Store at 4±2°C	30 days to extraction; 7 days to analysis		
IDW Soil and Wat	IDW Soil and Water Samples					
Reactivity, corrosivity, and ignitibility	SW-846 9045C, 1030, and Chapter 7 ³	One 8- ounce glass jar with Teflon TM -lined cap	Store at 4±2°C	NA/72 hours		
TCLP VOCs and metals	SW-846 1311 ³	One 8- ounce glass jar with Teflon TM -lined cap	Store at 4±2°C	14 days		

Notes

- Holding time is shown as the time from sample collection to the time of sample extraction/time from sample extraction to analysis (as appropriate).
- ² EPA 2010
- ³ EPA 1996
- ⁴ EPA 2007

CLP = Contract Laboratory Program

EPA = U.S. Environmental Protection Agency

HCl = hydrochloric acid

HDPE = high-density polyethylene

TAL = Target Analyte List

TCL = Target Compound List

TCLP = Toxicity Characteristic Leaching Procedure

VOC = volatile organic compound

TABLE 6

FREQUENCY OF FIELD QUALITY CONTROL SAMPLES WEST COUNTY ROAD 112 GROUND WATER PLUME SITE

Field QC Sample	Frequency ¹
Trip blank	1 per cooler containing aqueous samples for VOC analysis
Field blank	1 per day, if site conditions render this sample necessary
Field duplicate	1 per 10 samples
Equipment rinsate blank	1 per non-dedicated equipment type per day or 1 per 20 samples
MS/MD ² (inorganics)	1 per 20 samples (or per EPA Region 6 Laboratory requirements)
MS/MSD ² (organics)	1 per 20 samples (or per EPA Region 6 Laboratory requirements)
Temperature blank	1 per cooler

Notes

¹ The QC sample collection frequency applies to samples collected for fixed-laboratory analysis (EPA 1996; 2007; 2010a).

² MS, MSD, and MD analyses are technically not field QC samples; however, they generally require that the field personnel collect additional volumes of samples and are, therefore, included on this table for easy reference.

